



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

SEP - 2 2010

OFFICE OF
CHEMICAL SAFETY
AND POLLUTION PREVENTION

CERTIFIED MAIL: Article Number 7006 2150 0002 6305 7521

EcoSmart Technologies, Inc.
c/o Ms. Sharon Johnston
3600 Mansell Road, Suite 150
Alpharetta, GA 30022

Subject: Agency-initiated Required Label Amendments
EPA Reg. Nos. 67425-15, -16, and -25

Dear Ms. Johnston:

During a recent review of products that contain 2-phenethyl propionate, the Agency determined that the following products include uses in food handling establishments, which are considered both "food" and "non-food." To date, there is no petition in accordance with 40 CFR §180.7, established tolerance, or acceptable data on file, to account for potential 2-phenethyl propionate residues in food.

EPA Reg. No.	Product Name	Use Sites
67425-15	EcoPCO AR/X	Schools, motels, hospitals, nursing homes, day-care centers, factories, warehouses, stores, supermarkets, food handling establishments, food processing plants, bottling plants
67425-16	EcoPCO D/X	Hotels, motels, schools, hospitals, nursing homes, day-care centers, factories, warehouses, stores, supermarkets, restaurants, food handling establishments, commercial or institutional kitchens, food processing plants, zoos
67425-25	EcoPCO WP/X	Hotels, motels, schools, hospitals, nursing homes, day-care centers, factories, warehouses, stores, supermarkets, restaurants, food handling establishments, commercial or institutional kitchens, food processing plants, zoos

Therefore, you may choose to do one of the following two options:

- 1) Amend the labels to caveat food handling establishments for use in NON-FOOD AREAS only (including restaurants, supermarkets, processing plants, bottling plants, hotels, hospitals, motels, factories, commercial/institutional kitchens, zoos, etc.), or
- 2) Delete the reference to any establishments or facilities that may handle food in its entirety under FIFRA 6(f).

Within 45 days from the date of this letter, you must respond by submitting updated draft labels reflecting one of the two options described above. If this condition is not complied with, the registration will be subject to cancellation in accordance with FIFRA Section 6(e).

If you have any questions concerning this action, you may contact Rosanna Louie-Juzwiak at louie-juzwiak.rosanna@epa.gov of my team.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Gebken". The signature is fluid and cursive, with the first name "Richard" and last name "Gebken" clearly distinguishable.

Richard Gebken
Product Manager 10, Insecticides Branch
Registration Division